

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

DANIEL LOUTH, individually and on behalf of all
other similarly situated,

Plaintiff,

v.

NFL ENTERPRISES LLC,

Defendant.

C.A. No. 1:21-cv-00405

**ASSENTED TO MOTION TO EXTEND NFL ENTERPRISES LLC'S
TIME TO RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant NFL Enterprises LLC (“NFL Enterprises”) respectfully submits this assented to motion for a twenty-one (21) day extension of time to respond to the Amended Complaint filed by Plaintiff, Daniel Louth, in the above-captioned matter.

In support of this motion, NFL Enterprises respectfully states to the Court as follows:

1. On September 12, 2022, this Court issued an 11-page Memorandum and Order granting in part and denying in part NFL Enterprises’ Motion to Dismiss Plaintiff’s Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6).

2. Pursuant to Fed. R. Civ. P. 12(a)(4)(A), NFL Enterprises has 14 days from September 12, 2022, to answer Plaintiff’s Amended Complaint. Thus, NFL Enterprise’s answer to the Amended Complaint is currently due on September 26, 2022.

3. Plaintiff’s Amended Complaint is 30 pages long, not including exhibits.

4. NFL Enterprises reasonably requires additional time to prepare and file an answer to the allegations in the Amended Complaint.

5. NFL Enterprises is requesting an additional 21 days, until Monday, October 17, 2022, to file an answer to Plaintiff's Amended Complaint.

6. This is the first request for an extension since the Court issued its Memorandum and Order.

7. Plaintiff's counsel has consented to NFL Enterprises' present request for an extension through and including October 17, 2022 to answer Plaintiff's Amended Complaint.

8. The requested extension would not affect other deadlines in this case, as the Court has not yet issued a Scheduling Order.

WHEREFORE, Defendant, NFL Enterprises LLC, requests the Court enter an Order granting this Assented To Motion and extending NFL Enterprises LLC's deadline to respond to the Amended Complaint through and including October 17, 2022.

Dated: September 16, 2022

Respectfully submitted,

By its attorneys,

/s/ Angel Taveras

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Attorneys for NFL Enterprises LLC

CERTIFICATE OF SERVICE

I, Angel Taveras, hereby certify that on September 16, 2022 a true and accurate copy of the foregoing *Assented Motion to Extend NFL Enterprises LLC's time to Respond to Amended Complaint* was filed electronically with the clerk of court via CM/ECF, which will then send a notification of such filing to all counsel of record and those who have registered for notice.

/s/ Angel Taveras
Angel Taveras